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 12 **UNITED STATES DISTRICT COURT**  
 13 **NORTHERN DISTRICT, SAN FRANCISCO**

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 15 LA QUINTA FRANCHISING, LLC,  
 16 a Nevada limited liability company,

17 Plaintiff,

18 vs.

19 CORDELIA HOTEL VENTURE, INC.,  
 20 a California Corporation and DOLAT  
 21 PATEL, an individual,

22 Defendants.

23 Case No. C072556 JL

24 [Assigned to Magistrate Judge James  
 25 Larsen]

26 **DECLARATION OF JOEL D. SIEGEL  
 27 IN SUPPORT OF REQUESTS TO  
 28 ENTER DEFAULT**

29 [Filed concurrently with Requests to  
 30 Enter Default of Defendant Dolat Patel;  
 31 and Requests to Enter Default of  
 32 Defendant Cordelia Hotel Venture, Inc.]

33  
 34 I, JOEL D. SIEGEL, declare and state as follows:

35 1. I am an attorney, duly licensed to practice before the United  
 36 States District Court for the State of California. I am a partner of Bryan Cave LLP,  
 37 attorneys for Plaintiff La Quinta Franchising, LLC. ("Plaintiff"). I submit this  
 38 declaration in support of entry of default judgment against Defendants Cordelia  
 39 Hotel Venture, Inc., and Dolat Patel ("Defendants"). This Declaration is based  
 40 upon my personal knowledge, and if I were called as a witness, I could and would  
 41 testify as set forth below.

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1                   2. On May 14, 2007, Plaintiff La Quinta Franchising, LLC filed a  
2 Complaint in the above-entitled action against Defendants CORDELIA HOTEL  
3 VENTURE, INC. and DOLAT PATEL.

4                   3.     On May 15, 2007, Defendant CORDELIA HOTEL VENTURE,  
5 INC. was personally served with the Summons and Complaint in this action as  
6 appears from the Proof of Service attached hereto as Exhibit A.

7                   4. On May 15, 2007, Defendant DOLAT PATEL was personally  
8 served with the Summons and Complaint in this action as appears from the Proof of  
9 Service attached hereto as Exhibit A.

10                   5. To date, neither an appearance nor a responsive pleading has  
11 been made or filed in this case by Defendants CORDELIA HOTEL VENTURE,  
12 INC. or DOLAT PATEL.

13                   6. Plaintiff La Quinta Franchising, LLC has filed Requests for  
14 Entry of Default by the Clerk concurrently herewith as to Defendants CORDELIA  
15 HOTEL VENTURE, INC., and DOLAT PATEL in this action.

16 I declare under penalty of perjury of the laws of the United States of  
17 America that the foregoing is true and correct.

18 Executed on June 25, 2007, at Santa Monica, California.

15

Joel D. Siegel